

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: William Andrew Karo

**Case No. 13-33011-KRH
Chapter 7**

**OBJECTION TO MOTION TO EXAMINE PURSUANT TO RULE 2004 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

COMES NOW Page S. Karo, by counsel, and objects to the Motion filed by Bruce Robinson, Trustee, filed under Bankruptcy Rule 2004 for the following reasons:

1. The conclusion of the Trustee in Paragraph 3 and/or 8 (as the numeration of the document appears to be incorrect) of the Motion that the Court of Appeals agreed with Wachovia Bank's legal position is inaccurate. In fact, Wachovia Bank as Trustee recognized the disclaimer as valid and transferred the corpus of the Karo Inter Vivos Residual Trust to Page S. Karo for the benefit of her minor son, conveyance of which was negotiated between counsel for Wachovia Bank and counsel for Page S. Karo. As such, the disclaimer was deemed valid by Wachovia Bank as trustee.
2. Further, we object to the request for production of documents, detailed in Schedule B, for the following reasons:
 - a. We object to Request 1, as we do not have any documentation that was not already attached to the Motion.

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- b. We object to Request 2, as it requested privileged information and documentation.
- c. We object to Request 3, as there are no other documents than the disclaimer itself.
- d. We object to Request 4, as there are no other documents than the disclaimer itself.
- e. We object to Request 5, as it is unclear what is being requested. To the extent that any of the requested information is privileged, we further object to it.
- f. We object to request 6, as these documents are not germane to these proceedings.
- g. We object to Request 7, as all income tax returns have already been provided, except for the 2013 tax year, which has not yet been prepared.
- h. We object to Request 8, as there is no legal basis to turn over these documents for any reason.
- i. We object to Request 9, as there is no legal basis to turn over these documents for any reason.

WHEREFORE, Page S. Karo requests that this Court dismiss the Motion filed pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure and to award any further relief that this Court may deem necessary.

PAGE S. KARO

By: /s/ Robert A. Canfield
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd of January, 2014 a copy of the foregoing Objection was either electronically transmitted and/or mailed by regular mail, postage prepaid to all necessary parties:

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/s/ Robert A. Canfield
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